

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

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**ALBA QUIÑONEZ FLORES,**  
**Plaintiff,**

**v.**

**UNITED STATES OF AMERICA;  
DOES 1-10**

**Defendants.**  
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**PLAINTIFF'S NOTICE OF MOTION  
FOR AN ORDER TO SHOW CAUSE  
WHY DEFENDANT SHOULD NOT BE  
HELD IN CIVIL CONTEMPT AND  
MOTION FOR PROTECTIVE ORDER**

**Civil Action No. 14-CV-3166 (JBW) (RML)**

PLEASE TAKE NOTICE that, upon the accompanying Affidavit and Memorandum of Law, Plaintiff Alba Quiñonez Flores will move this Court, before the Honorable Robert M. Levy at 225 Cadman Plaza East, Brooklyn, New York 11201, as soon as may reasonably be heard, for an order to show cause why Defendant United States of America should not be held in civil contempt pursuant to Fed. R. Civ. P. 37(b)(2)(A) and Local Civil Rule 83.6. Plaintiff will also move for a protective order to prevent the unauthorized depositions of Plaintiff and Wilfredo Sandoval Flores.

Dated: April 8, 2015

Respectfully submitted,

/s/ Ira J. Kurzban  
Ira J. Kurzban (*pro hac vice*)  
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/s/ Jennie Santos-Bourne  
Jennie Santos-Bourne (*pro hac vice*)  
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*Counsel for Plaintiff*

TO:

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Margaret.Kolbe2@usdoj.gov

*Counsel for Defendant United States of America*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 8, 2015, I filed the foregoing document and all attachments with the Clerk of Court, using the CM/ECF system, which will send a notification of such filing to the following:

Margaret M. Kolbe  
Assistant U.S. Attorney  
United States Attorney's Office  
271 Cadman Plaza East, 7th Floor  
Brooklyn, New York 11201  
Margaret.Kolbe2@usdoj.gov

And I hereby certify that I mailed the foregoing document by U.S. Mail to the following non-filing user:

None

/s/Ira J. Kurzban  
Ira J. Kurzban